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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

YANISSA WATSON,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

PAUL NUGENT, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about September 18, 2015, within the Eastern District of New York and elsewhere, the defendant YANISSA WATSON did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960)

The source of your deponent's information and belief are as follows:¹

1. On or about September 18, 2015, the defendant YANISSA WATSON arrived at John F. Kennedy International Airport ("JFK") in Queens, New York, aboard JetBlue flight B6 662 from Bridgetown, Barbados.

¹ Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

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C O M P L A I N T

(21 U.S.C. §§ 952(a) and 960))

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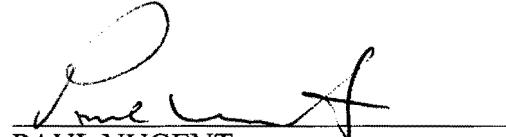
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2. The defendant YANISSA WATSON was selected for a Customs and Border Protection ("CBP") examination. WATSON acknowledged ownership of her bags and their contents. CBP officers conducted an examination of the bags and noticed a strong chemical-like odor during the exam.

3. The defendant YANISSA WATSON was escorted to a private examination area where the bottom of a pair of sneakers in her luggage was probed. A white powdery substance was extracted, which field-tested positive for the presence of cocaine. Additional shoes in WATSON's luggage were also probed and found to contain substances which field-tested positive for cocaine. WATSON was placed under arrest.

4. The total approximate gross weight of the cocaine recovered from the defendant YANISSA WATSON's luggage was approximately 4.8915 kilograms.

WHEREFORE, your deponent respectfully requests that defendant YANISSA WATSON be dealt with according to law.



PAUL NUGENT
Special Agent
Homeland Security Investigations

Sworn to before me on
the 19th day of September, 2015



SIA. Kathleen Tomlinson

THE HONORABLE A. KATHLEEN TOMLINSON
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK